



Mars Khaimov Law, PLLC

108-26 64th Avenue, Second Floor
Forest Hills, NY 11375
Tel.: 929.324.0717
E-mail: mars@khaimovlaw.com

May 29, 2024

VIA ECF

Honorable Judge Sidney H. Stein
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

MEMO ENDORSED

Re: Case 1:23-cv-09459-SHS, Tarr v. Kenneth Jay Lane, Inc., et. al.

Plaintiff's Fourth Letter Motion to Adjourn Conference and Related Submissions

Dear Judge Stein:

Plaintiff respectfully submits this letter motion to adjourn the initial conference that is scheduled to take place on May 31, 2024 at 9:00 a.m. in Courtroom 23A before Judge Stein as per the directives set forth in the April 24, 2024 order, and to adjourn the related submission deadlines, if any, sine die.

Plaintiff's counsel is currently in some communication with the Defendant, Rouge Jardin Jewelry, LLC, but the Defendant has given no indication that they intend to appear formally in the lawsuit. The Defendant's answer was due by April 8, 2024 and Plaintiff will seek the entry of a default judgment immediately upon the entry of a Certificate of Default. This is the Plaintiff's fourth request to adjourn the initial conference and related submission deadline.

We thank Your Honor for the attention and consideration herein.

Respectfully submitted,

/s/ Mars Khaimov
Attorneys for Plaintiff

Cc: all Counsel of record on ECF

The conference is adjourned to June 21 at 9:00 a.m. Any party seeking entry of a default judgment pursuant to F.R.Civ. P 55(b)(2) and Local Civil Rule 55.2(b) shall move, on notice to the adversary, specifying a return date at least 10 days from the date of service, returnable at 9:30 a.m. in Courtroom 23A. The motion shall include: (a) the notice of motion; (b) a completed clerk's certificate of default; (c) the claim to which no response has been made; and (d) a proposed form of default judgment.

**Dated: New York, New York
May 30, 2024**

SO ORDERED:

Sidney H. Stein, U.S.D.J.